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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

v.

CODY BEAU PORTER,

Defendant.

Case No. 3:20-cr-00211-JO

MOTION TO ALLOW
INTERNATIONAL TRAVEL

The defendant, Cody Beau Porter, through counsel, Susan Russell, respectfully moves this Court to enter an order authorizing his travel abroad to Medellin, Columbia, departing December 11, 2020, and returning January 1, 2021. The government, through AUSA Gary Sussman, has been contacted twice regarding this motion but has not replied with its position. U.S. Pretrial Services Officer Noe Rios is supervising Mr. Porter while on pretrial release and has confirmed his understanding that because Mr. Porter's travel

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request involves international travel, a motion must be made to the Court for authorization. Officer Rios does not take a position regarding Mr. Porter's request to travel to Columbia, but does note that Mr. Porter is in full compliance with all pretrial release conditions and has been "very cooperative" with Officer Rios.

Mr. Porter is charged by information with one count of misdemeanor Assault on a Federal Officer. Reports provided by the government through discovery allege that on July 5, 2020, Mr. Porter assaulted federal law enforcement officers by directing a laser towards officers during the performance of their duties at the Hatfield Courthouse. Mr. Porter denies this conduct.

Mr. Porter is requesting permission to travel by airplane from Portland, Oregon to Medellin, Columbia from December 11, 2020 to January 1, 2021, together with his fiancée. While in Columbia, Mr. Porter will be staying at his fiancée's sister's house and working to improve his Spanish skills through immersion.

Mr. Porter is a college graduate and plans to continue his studies in a graduate program in the near future. Presently, Mr. Porter is employed fulltime as a Skills Trainer at a mental health treatment facility in Portland, Oregon. This facility provides both residential and outpatient treatment services. As a Skills Trainer, Mr. Porter is responsible for providing supervision and trauma informed care to clients in the facility's Residential Treatment Center, including by implementing treatment programming as part of an interdisciplinary team of professionals. Mr. Porter's employer is supportive of his foreign

travel plans to improve his Spanish through immersion and has authorized his leave for this purpose.

Mr. Porter will comply with any additional conditions that the Court may deem necessary concerning his limited travel abroad to improve his Spanish language skills. Accordingly, Mr. Porter respectfully requests his motion to allow international travel be granted.

RESPECTFULLY submitted this 12th day of November, 2020.

/s/ Susan Russell
Susan Russell
Assistant Federal Public Defender